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12 Kiewit Infrastructure West Co.

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10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 CHAD KREISER, individually, CHRISTINA  
13 LOU KRIESER

14 Plaintiffs,  
15 v.  
16

17 K & B STEEL, A DIVISION of WABB  
18 INDUSTRIES, INC., a Texas Corporation;  
19 KIEWIT WESTERN CO. d/b/a LAKE MEAD  
20 CONSTRUCTORS, a Foreign Corporation;  
21 DOES I through X; inclusive; and ROE  
22 BUSINESS ENTITIES XI through XX,  
23 inclusive

24 Defendants.

CASE NO: 2:16-cv-01361-MMF- CWH

**STIPULATION AND PROPOSED  
ORDER TO ALLOW KIEWIT TO  
FILE A SUPPLEMENTAL  
MEMORANDUM TO ITS MOTION  
TO DISMISS OR ALTERNATIVELY,  
MOTION FOR SUMMARY  
JUDGMENT AND TO EXTEND  
DEADLINES RELATED THERETO  
(Second Request)**

19 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs, CHAD  
20 KREISER and CHRISTINA LOU KRIESER, Defendant, KIEWIT INFRASTRUCTURE WEST  
21 CO., as successor through merger to KIEWIT WESTERN CO. d/b/a LAKE MEAD  
22 CONSTRUCTORS (hereinafter “Kiewit”), and K & B STEEL, A DIVISION OF WABB  
23 INDUSTRIES, INC., by and through their respective counsel of record, that Kiewit be permitted  
24 to file a supplemental memorandum, including correcting the name and date of substantial

1 completion of the project at issue and submitting an additional supporting affidavit, to its Motion  
2 to Dismiss or Alternatively, Motion for Summary Judgment, which was filed on May 11, 2018  
3 (ECF No. 46). The proposed Supplemental Memorandum in Support of Defendant Kiewit  
4 Infrastructure West Co.'s Motion to Dismiss or Alternatively, Motion for Summary Judgment is  
5 attached hereto as Exhibit A.

6 IT IS FURTHER STIPULATED AND AGREED that the parties' responsive pleadings  
7 shall be due on or before June 15, 2018 allow the parties sufficient time to oppose Kiewit's  
8 motion and forthcoming Supplemental Memorandum on the merits.

9 This is the second stipulation for extension of time to extend deadlines regarding  
10 Kiewit's Motion to Dismiss.

11 Dated this 30<sup>th</sup> day of May, 2018.

12 CHRISTIANSEN LAW OFFICES

13 /s/ *Keely A. Perdue, Esq.*

14 By \_\_\_\_\_  
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*Attorneys for Plaintiffs*

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23 ...

24 ...

KRING & CHUNG, LLP

/s/ *Robert L. Thompson, Esq.*

By \_\_\_\_\_  
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*Attorneys for Defendant K & B Steel, a  
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1 ALVERSON, TAYLOR  
2 MORTENSEN & SANDERS

3 */s/ Karie N. Wilson, Esq.*

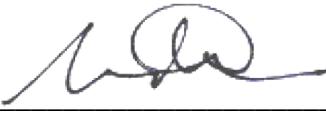
4 By \_\_\_\_\_  
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13 *Attorneys for Defendant*  
14 *Kiewit Infrastructure West*

15 **(PROPOSED) ORDER**

16 IT IS HEREBY ORDERED that Defendant, KIEWIT INFRASTRUCTURE WEST CO.,  
17 as successor through merger to KIEWIT WESTERN CO. d/b/a LAKE MEAD  
18 CONSTRUCTORS, be permitted to file a supplemental memorandum, including correcting the  
19 name and date of substantial completion of the project at issue and submitting an additional  
20 supporting affidavit, to its Motion to Dismiss or Alternatively, Motion for Summary Judgment,  
21 which was filed on May 11, 2018 (ECF No. 46).

22 IT IS FURTHER ORDERED that the parties' responsive pleadings shall be due on or  
23 before June 15, 2018 allow the parties sufficient time to oppose Kiewit's motion and  
24 forthcoming Supplemental Memorandum on the merits.

25 Dated this 31st day of May, 2018.

26   
27 U.S. DISTRICT COURT JUDGE